

# EXHIBIT D

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

MICHAEL L. MCDONALD,

Plaintiff,

v.

Civil Action No. \_\_\_\_\_

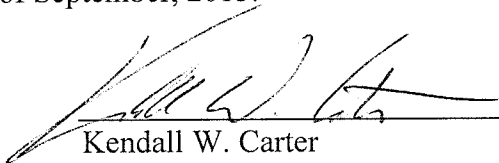
EQUIFAX, INC.,  
EXPERIAN, L.L.C. and  
TRANS UNION, L.L.C.,

Defendants.

**DEFENDANT EQUIFAX, INC.'S CONSENT TO REMOVAL**

Without waiving any of its defenses or any other rights, Defendant Equifax, Inc. hereby consents to the notice of removal of this action from the District Court of Rockwall County, Texas, wherein it is now pending, to the United States District Court for the Northern District of Texas, Dallas Division. Removal of this action is proper for the reasons set forth in the Notice of Removal and Exhibits thereto filed by co-defendant Trans Union LLC. Defendant Equifax, Inc. first received a copy of the Summons and Petition, the initial pleading setting forth the claim for relief upon which this action is based, on September 14, 2015.

Respectfully submitted this 30<sup>th</sup> day of September, 2015.



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